## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

JEAN COMAS,

Plaintiff

CA No. 04-10691-PBS

VS.

JOSEPH F. MCDONOUGH Respondent

### MOTION TO EXTEND TIME TO RESPOND

Now comes the Petitioner and moves this Honorable Court to extend the time for filing a response to the respondent's Motion to Dismiss until May 17, 2004. The basis for this Motion is the need for Petitioner's counsel to travel to California with his son to help him move into a new job/apartment upon his graduation from college. Petitioner's counsel will not have access to research materials on this trip.

Assistant U.S. Attorney, Mark J. Grady has assented to this motion.

By his attorney,

Michael D. Greenberg Esq.

Law offices of Michael D. Greenberg

2343 Massachusetts Ave.

Cambridge, MA 02140

TEL: (617) 876-2020

FAX: (617) 876-0082

BBO# 209540

#### Certificate of Service

I, Michael D. Greenberg, do certify under the pains and penalties of perjury that I did serve a copy of this Motion upon counsel for the respondent, Mark J. Grady, at the U.S. attorney's office by first class mail.

Michael D. Greenberg

Law Offices of

# Michael D. Greenberg

# 2343 Massachusetts Ave., Cambridge, MA 02140

telephone (617) 876-2020 facsimile (617) 876-0082 e-mail mdglaw@veriomail.com

April 28, 2004

Christine Patch
Clerk's Office
U.S. District Court
John Joseph Moakley U.S. Courthouse
1 Courthouse Way
Boston, MA 02210

RE:

Comas vs. McDonough

04CV10691-PBS

Dear Ms. Patch:

I enclose for consideration by the Court a Motion to Extend time to respond to the Motion to Dismiss. I am going to my son's graduation in Atlanta on Friday, April 30, 2004 and then have arranged to go with him to California where he is moving with his first real job.

He needs my help to settle in out there, get an apartment, and a car. I will be returning on May  $10^{th}$  and have a response to another case due by the  $11^{th}$  in front of Judge Lasker.

Thank you for the Court's consideration of this motion.

Yours truly.

Michael D. Greenberg

Enclosure

Cc Mark J. Grady AUSA